

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFAO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL,

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

**DECLARATION OF KEVIN C. QUIGLEY IN SUPPORT OF DEFENDANTS' MOTION
TO REFER ATTORNEY JOFFE'S MISCONDUCT TO THE PRESIDING JUDGE, AND
FOR OTHER SANCTIONS**

I, Kevin C. Quigley, hereby declare as follows:

1. I am an attorney at the law firm of Choate, Hall & Stewart, LLP. I, along with my colleagues, represent Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill ("Defendants") in the above-captioned litigation. I submit this declaration in support of Defendants' Motion to Refer Attorney Joffe's Misconduct to the Presiding Judge.

2. Exhibit A is a true and correct copy of a video and audio recording of the November 10, 2020 deposition of James O'Grady. Exhibit A will be submitted to the Court via a secure File Transfer Protocol link.

3. Attached hereto as Exhibit B is a true and correct copy the transcript of the deposition of James O'Grady, dated November 10, 2020.

4. Attached hereto as Exhibit C is a true and correct copy of the transcript of the video status conference held before the Court on November 12, 2020.

5. Attached hereto as Exhibit D is a true and correct copy of the transcript of the video status conference held before the Court on November 10, 2020.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the transcript of the deposition of David Gill, dated November 4, 2020.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from the transcript of the deposition of Kevan Bartley, dated November 6, 2020.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts from the transcript of the deposition of Tom Harris, dated October 30, 2020.

9. Attached hereto as Exhibit H is a true and correct copy of excerpts from the transcript of the deposition of Stuart Patterson, dated November 12, 2020.

10. Attached hereto as Exhibit I is a true and correct copy of a letter from Defendants' counsel, Michael Bunis, to Plaintiffs' counsel, Dimitry Joffe, dated February 11, 2020.

11. Attached hereto as Exhibit J is a true and correct copy of an email thread between Mr. Joffe and Defendants' counsel, dated November 18, 2020.

12. Attached hereto as Exhibit K is a true and correct copy of screen-captured images from Mr. Joffe's publicly-available LinkedIn profile, as it appeared on November 18, 2020.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 20, 2020

Respectfully submitted,

/s/ Kevin C. Quigley

Kevin C. Quigley (BBO No. 685015)

CERTIFICATE OF SERVICE

I, Kevin C. Quigley, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that the foregoing document was filed using the CM/ECF system and electronic notice will be sent to registered participants as indicated on the Notice of Electronic Filing (NEF) on November 20, 2020.

/s/ Kevin C. Quigley

Kevin C. Quigley